

EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET - SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230
Fax (212) 571-5507

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
FILED: 3-19-25

BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196

March 18, 2025

3/18/25

Travel restrictions
Amended to include
travel to Connecticut.

Hon. Colleen McMahon
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Filed on ECF

United States v. Emmanuel Torres
24 Cr. 474

Colleen McMahon

Dear Judge McMahon:

We represent Emmanuel Torres pursuant to the Criminal Justice Act. He is out on bail and his travel is currently restricted to the Eastern and Southern Districts of New York. We write to respectfully request that his bail conditions be modified so that he can visit his brother in Meriden, Connecticut. Emmanuel hopes to travel there this Thursday (when he is off from work) and anticipates wanting to spend as much time with him as possible on his days off before he surrenders in May. For this reason, we are asking that his travel restrictions be amended to include the District of Connecticut. We have reached out to both pretrial services and the Government to discuss this modification, and neither has any objection.

Respectfully submitted,
Sarah M. Sacks